

**BEFORE THE  
FEDERAL MARITIME COMMISSION**

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**DOCKET NO. 15-11**

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**IGOR OVCHINNIKOV, IRINA RZAEVA, and DENIS NEKIPELOV,**

— vs. —

**MICHAEL HITRINOV a/k/a  
MICHAEL KHITRINOV,  
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

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**INFORMAL DOCKET NO.: 1953(I)**

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**KAIRAT NURGAZINOV,**

— vs. —

**MICHAEL HITRINOV a/k/a  
MICHAEL KHITRINOV,  
EMPIRE UNITED LINES CO., INC., and CARCONT, LTD.**

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**COMPLAINANTS' REPLY TO RESPONDENTS' REVISED  
MOTION FOR EXTENSION OF TIME**

Pursuant to Rules 69 and 71 of the Federal Maritime Commission's (the "Commission") Rules of Practice and Procedure (46 C.F.R. 502 *et seq.*), Complainants, through their Counsel, Marcus A. Nussbaum, Esq., respectfully submit this brief in reply to Respondents' Revised Motion for Extension of Time.

In consideration of the sworn representations of Respondents' Counsel by Eric Jeffrey, Esq. as to a family health situation, and without commenting on any procedural or titling defects with respect thereto, Complainants do hereby consent to Respondents' application for an extension of time within which to file a Reply on their Motion for Judgment on the Pleadings *solely*, and *not* as

to any other motion as there presently exists no such other motion which would require a response by July 15, 2016.

Complainants give such consent with the clear understanding that Respondents *shall* and *will* not seek any further adjournments with respect to a date certain for filing of their Reply to their Motion for Judgment on the Pleadings beyond that as affixed by the Presiding Officer.

Respectfully submitted,

Dated: June 28, 2016  
Brooklyn, New York

A handwritten signature in black ink, appearing to read 'Marcus A. Nussbaum', written over a horizontal line.

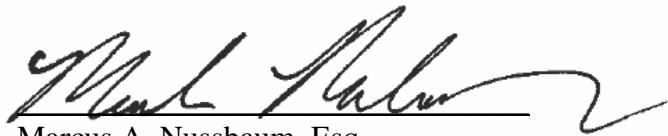
Marcus A. Nussbaum (MN9581)  
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*Attorney for Complainants*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the attached **COMPLAINANTS' REPLY TO RESPONDENTS' REVISED MOTION FOR EXTENSION OF TIME** upon Respondents' Counsel at the following address:

Nixon Peabody LLP  
Attn: Eric C. Jeffrey, Esq.  
799 9th Street NW, Suite 500  
Washington, DC 20001-4501

by first class mail, postage prepaid, and by email (ejeffrey@nixonpeabody.com).

A handwritten signature in black ink, appearing to read 'Marcus A. Nussbaum', is written over a horizontal line.

Marcus A. Nussbaum, Esq.  
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marcus.nussbaum@gmail.com

Dated: June 28, 2016 in Brooklyn, New York.